

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BELLSOUTH TELECOMMUNICATIONS, INC.
DIRECT TESTIMONY OF DAVID P. SCOLLARD
BEFORE THE TENNESSEE REGULATORY AUTHORITY
DOCKET NO. 01-00362
JUNE 21, 2000

Q. PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH
BELLSOUTH TELECOMMUNICATIONS, INC. ("BELLSOUTH").

A. I am David P. Scollard, Room 28A1, 600 N. 19th St., Birmingham, AL 35203.
My current position is Manager, Wholesale Billing at BellSouth Billing, Inc.
("BBI"), a wholly owned subsidiary of BellSouth Telecommunications, Inc. In
that role, I am responsible for overseeing the implementation of various
changes to BellSouth's Customer Records Information System ("CRIS") and
Carrier Access Billing System ("CABS").

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I graduated from Auburn University with a Bachelor of Science Degree in
Mathematics in 1983. I began my career at BellSouth as a Systems Analyst
within the Information Technology Department with responsibility for
developing applications supporting the Finance organization. I have served in a
number of billing system design and billing operations roles within the billing
organization. Since I assumed my present responsibilities, I have overseen the
progress of a number of billing system revision projects such as the billing of

1 unbundled network elements (“UNEs”), as well as the development of billing
2 solutions in support of new products offered to end user customers. I am
3 familiar with the billing services provided by BellSouth Telecommunications
4 to local competitors, interexchange carriers and retail end user customers.

5

6 Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE PUBLIC
7 SERVICE COMMISSION? IF SO, BRIEFLY DESCRIBE THE SUBJECT
8 OF YOUR TESTIMONY.

9

10 A. I have testified before the state Public Service Commissions in Alabama,
11 Florida, Georgia, Kentucky, Louisiana, Mississippi, South Carolina, the
12 Tennessee Regulatory Authority, and the Utilities Commission in North
13 Carolina on issues regarding the capabilities of the systems used by BellSouth
14 to bill for services provided to retail customers, Interexchange Carriers (IXCs)
15 as well as Competing Local Providers (CLECs).

16

17 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY BEING FILED
18 TODAY?

19

20 A. My testimony shows that the systems and processes used by BellSouth to
21 provide invoices and other billing information to CLECs in Tennessee are the
22 same systems and processes used by BellSouth to provide billing information
23 to CLECs in all states in the BellSouth region.

24

25

1 Q. IDENTIFY THE SYSTEMS BELL SOUTH USES TO PROVIDE BILLING
2 TO CLECs FOR SERVICES ORDERED FROM BELL SOUTH.

3

4 A. The systems used to provide billing information to CLECs vary depending on
5 the services being ordered. If a CLEC orders a service for resale, the service
6 request is channeled to CRIS to maintain a record for the CLEC of the services
7 that BellSouth has provided. Likewise, usage events (toll calls, local calls,
8 vertical service activations that are billed on a per use basis, etc.) associated
9 with the resold services are also sent through CRIS. For facilities-based
10 CLECs, CRIS is used to maintain a record of service requests and resulting
11 billing transactions for unbundled switch ports and unbundled loops (service
12 level 1 loops). Service requests for all other Unbundled Network Elements
13 (“UNEs”) and interconnection services are channeled through CABS.
14 Therefore, all of the billing transactions related to all other UNEs and
15 interconnection services are accumulated in CABS for preparing bills to the
16 CLEC.

17

18 Records associated with unbundled switch ports are sent to the UNE usage
19 billing process (referred to as the BellSouth Industrial Billing System or
20 “BIBS”). The invoice formats developed by the industry at the Ordering and
21 Billing Forum (“OBF”) did not allow switch port usage to be billed with call-
22 by-call detail as is done for end users in CRIS, nor did the invoice call for the
23 usage to be summarized in the way that access usage is billed in CABS.
24 Therefore, BIBS was developed to meet the unique billing requirements for
25 UNE usage.

1

2 CRIS and CABS are the same systems used to bill BellSouth's retail customers
3 and interexchange carriers for the services provided by BellSouth. Since
4 BellSouth does not provide UNEs to itself, there is no retail analog for UNE
5 usage billing and, therefore, BIBS is used solely to support CLEC billing.

6

7 Q. ARE THE PROCESSES AND EQUIPMENT USED FOR BILLING IN
8 TENNESSEE THE SAME AS THE PROCESSES AND EQUIPMENT USED
9 IN THE REMAINING STATES IN BELL SOUTH'S REGION?

10

11 A. Yes. For CRIS, CABS, and BIBS, the same physical software that processes
12 transactions and creates invoices in Tennessee also performs these same
13 functions in all other states in the BellSouth region. The control functions used
14 to manage the multitude of billing transactions are performed by the same
15 group for all of the states in the BellSouth region, including Tennessee.
16 Methods and procedures required to perform all of the steps to accurately
17 produce bills and usage information for CLECs are developed by a central staff
18 supporting all states. The maintenance of the various reference tables (such as
19 product rates, etc.) used by the billing system is handled for all states by one
20 group. The systems, processes, and procedures are the same for all states and
21 are created, maintained and executed by the same group of employees
22 regardless of the state being processed.

23

24 To effectively manage the massive amounts of data processing required to keep
25 the daily billing cycles running, customer accounts are segregated into separate

1 sets of databases depending on the state in which that account resides. Because
2 of this, multiple occurrences of CRIS, BIBS, and CABS run in parallel at the
3 same time utilizing all of these databases. However, all of the software
4 versions of CRIS, CABS and BIBS are identical to each other, and they are run
5 on the same type of hardware for all states. These separate processing streams
6 are running in two data centers in Birmingham, Alabama and Charlotte, North
7 Carolina. Regardless of which processing stream is running, the software,
8 controls, procedures, and processing steps required to create invoices and usage
9 records for customers (CLEC as well as retail) are the same.

10

11 Q. DOES THIS MEAN THAT THERE ARE NO DIFFERENCES AT ALL
12 BETWEEN INVOICES PROVIDED TO CUSTOMERS IN TENNESSEE
13 FROM INVOICES PROVIDED TO CUSTOMERS IN OTHER STATES
14 SERVED BY BELL SOUTH?

15

16 A. No. Because the products and services offered by BellSouth to customers in
17 Tennessee may differ from those offered in other states, the invoices
18 themselves will not be identical. While the underlying logic for CRIS, CABS,
19 and BIBS is the same throughout the nine states served by BellSouth, state-
20 specific and CLEC-specific differences within the systems are necessary due to
21 such things as:

- 22 ▪ different rates for products between states;
- 23 ▪ varying tax rules that may be adopted by state and local governments;
- 24 ▪ differences in the tariffs that have been approved by the commissions;
- 25 and

1 ▪ CLEC-specific differences in product rates or resale discounts.

2

3 To account for these differences, the reference tables BellSouth uses in its

4 billing systems must carry state-specific and CLEC-specific information.

5 However, the systems and processes used to maintain these tables, regardless
6 of the state, are the same.

7

8 Q. THE PROCESSES AND SYSTEMS USED FOR BILLING INCLUDED IN
9 THE THIRD-PARTY OSS TEST CONDUCTED BY KPMG CONSULTING,
10 INC. (“KPMG”) IN GEORGIA?

11

12 A. Yes. KPMG initiated thousands of billing transactions as part of the Operations
13 Support Systems (“OSS”) test in Georgia. The resulting invoices and usage
14 records were then reviewed against 161 different test criteria. As the final test
15 reports included as Exhibits OSS-67 and OSS-68 to Ron Pate’s testimony
16 show, all billing test criteria were satisfied. Since the billing processes and
17 systems tested in Georgia are the same as those used in Tennessee, additional
18 testing would be redundant.

19

20 Q. WOULD YOU PLEASE SUMMARIZE YOUR TESTIMONY?

21

22 A. Yes. I have shown that the billing systems and processes used in Tennessee are
23 the same as those used in all other states in the BellSouth region. The Third-
24 Party OSS Test in Georgia included the processes and systems used by
25 BellSouth to bill CLECs and all 161 test criteria used by KPMG to validate the

1 billing test were satisfied. Therefore, the testing performed in Georgia fully and
2 fairly represents the processes used in Tennessee.

3

4 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

5

6 A. Yes.

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

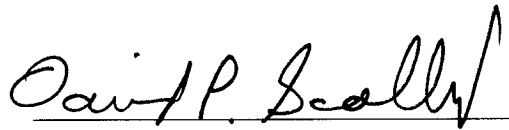
25

AFFIDAVIT

STATE OF: Alabama
COUNTY OF: Jefferson

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared David P. Scollard –Manager- Wholesale Billing, BellSouth Billing Inc., who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 01-00362 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be set forth in the annexed testimony consisting of 7 pages and 0 exhibit(s).



David P. Scollard

Sworn to and subscribed
before me on June 8, 2001


NOTARY PUBLIC

NOTARY PUBLIC STATE OF ALABAMA AT LARGE
MY COMMISSION EXPIRES: Dec 28, 2004
BONDED THRU NOTARY PUBLIC UNDERWRITERS